

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
)
Plaintiff,)
)
)
v.) Case No. 4:25-CR-149-RWS/SRW
)
)
)
LUIS FERNANDO HERRERA-LUNA,)
)
)
Defendant.)

DEFENDANT'S SENTENCING MEMORANDUM

COMES NOW Defendant Luis Fernando Herrera-Luna, by and through counsel, Assistant Federal Public Defender Bradley Swinney, and he is requesting for a guideline sentence. The Disclosure Presentence Report delineates that Luis' guideline range is 0 – 6 months, which is in Zone A of the sentencing guidelines table.¹ Luis was first represented at his Initial Appearance on March 17, 2025, and he has been in federal custody since his March 17th appearance. By the time of sentencing, Luis will have served four months in federal custody. Four months of incarceration can be considered middle to high in Luis' sentencing guideline range; for this reason, Luis is requesting the Court to order him to time served.

WHEREFORE, for all the reasons stated above, Luis prays this Court will order him to time served.

Respectfully submitted,

/s/ Bradley Swinney

¹ PSR ¶49.

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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Dianna Collins, Assistant United States Attorney.

/s/ Bradley Swinney